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Public Comments on Amateur Radio Use of the Allocation at 5 MHz:=====

Title: Amateur Radio Use of the Allocation at 5 MHz

FR Document Number: 2010-14384

Legacy Document ID:

RIN: null

Publish Date: Tue Jun 15 00:00:00 EDT 2010

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Para 9 proposes just two data modes, PSK31 and "2K80J2D (which is generally known as PACTOR-III) are are popular narrowband data modes." PACTOR-III is a proprietary mode provided only in costly equipment manufactured by a German company, SGC. Accordingly, it not "popular" as cited. Further, PSK31 does not provide for an ARQ mode to ensure accuracy of data transmission.

Therefore, I propose that allowable data modes be expanded to include AMTOR, a widely-used and public domain mode, and PACTOR-I, also widely used and available at low cost from multiple US

manufacturers (AEA, Kantronics, e.g.). Both also provide for ARQ and FEC operation to ensure accurate data transmission - important where data files provided by served agencies must be transmitted.

Respectfully submitted,

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